

EXHIBIT D

1 MS. MURPHY:

2 It wasn't answered.

3 MR. ABRAMS:

4 Go ahead. Tell her again.

5 THE WITNESS:

6 I am retained and I do what I am
7 told to do. And I am told, the wind got there
8 first. We are going to give up the first
9 floor. The second floor is wind damage.

10 BY MS. MURPHY:

11 Q. So based upon that approach that
12 the -- what was the ceiling height in the
13 first floor?

14 A. Eight feet.

15 Q. So if all the water that
16 inundated the first floor was eight feet and
17 above, then the three feet, the three feet of
18 additional water was all caused by wind?

19 A. No. It arrived after the wind
20 damage was there.

21 Q. So if I am to follow you
22 correctly, of the approximate 15 feet of
23 water, only the top three feet or five feet
24 was caused by wind and everything else was
25 flood of that surge?